



**Clear Mobitel (Jersey) Limited**  
**Clear Mobitel (Guernsey) Limited**

**Future of telephone numbers  
second consultation**

**June 2021**

## Introduction

Clear Mobitel is a new entrant operator in the Channel Islands. We intend to compete with the existing operators using an all IP network solution, thus will have a fully flexible network that will be compatible with any changes resulting from this consultation.

## Response to Consultation

**Question 3.1: Do you agree with our proposal to remove the obligation for telecoms providers to provide the local dialling facility? Please provide reasons for your response.**

The UK Numbering Plan has evolved over a long period of time and it is only in relatively recent history that Ofcom has exercised an overarching control of numbers. This was as a result of a fairly chaotic development following liberalization of the telecommunications market in the 1980s.

In this response we propose to examine the Ofcom proposals from the point of view of the Crown Dependencies and in particular the Channel Islands.

The Crown dependencies are a part of the UK numbering plan as a consequence of the fact that until 1971 the trunk network was owned and administered by The General Post Office Telephone Department. As a result they were incorporated into the National Dialling (STD) programme and allocated area code numbers under that scheme. Since that time the networks have been separated and subsequently subjected to different regulatory regimes.

As noted in the consultation, as a result of the independence of the Crown Dependencies in matters of regulation, local operators are considered to be international by UK based operators and thus subject to out-of-bundle pricing. Clear Mobitel is not as confident as Ofcom in its assumption that there will be convergence of termination rates encouraging flat pricing for such calls. The market dynamics in the Channel Islands are considerably different from those elsewhere in Europe. Furthermore, in light of the recent decision by EE to reintroduce roaming charges within the EU, Clear Mobitel is not convinced that UK operators will bring calls to the Crown Dependencies within bundles.

We are of the opinion that the Crown Dependencies should be separated out of the UK National Numbering Plan in order that it becomes clearer to consumers that there is likely to be extra charges when calling.

As observed in the consultation, landline numbers have decreasing relevance to residential consumers and now seems to have become the preserve of businesses in the main. Larger businesses rely on landline numbers more than small businesses and many micro businesses no longer advertise using such numbers. In addition many businesses now operate online where there is no means of telephoning for support as they rely entirely on web-based feedback.

Technology has evolved in such a way that many users no longer consider their first attempt at communicating should be by telephone. Alternative means such as online website chat services, mobile apps and voice and video features of social media sites have replaced traditional telephony, especially among younger consumers.

As noted above the current national numbering system has developed over many years and began when BT's forerunner Post Office Telephones owned the entire trunk network including that of the Crown Dependencies. At this time it made perfect sense to include all Post Office trunk exchanges in the network. Call charges were at that time determined by distance. However, since then the rationale of charging for calls has changed and now consumers are charged not by distance but time, and this time allowance is often included in both fixed line and mobile bundles. It therefore surprises consumers when additional charges appear on their bills for what appears to be a national number.

It is our view that the current position of the Crown Dependencies in the National Numbering Plan has run its course and there should be a clear separation of these destinations. This would be best achieved by the allocation of international codes to the Crown Dependencies. This would enable consumers to be clear where call charges are likely to be out of bundle and charged at a higher rate than bundled minutes. Technically this is not difficult to achieve and the two systems could be run together for a period to enable consumers and businesses to adapt.

**Question 3.2: Do you agree with our proposal to retain the provisions in the Numbering Plan which (i) allocate location significance to area codes and (ii) allow phone users to request out-of-area use of geographic numbers? Please provide reasons for your response.**

Since the introduction of mobile telephones to the mass market consumers have become aware that even local numbers require a national code. However, for landline users local numbers do have some convenience and for business local presence can be a useful marketing tool. Nevertheless, out of area number allocations can simulate a local presence which may be confusing to consumers.

In the Channel Islands the use of out of area is not feasible, since local national codes are not permitted for use outside the locally regulated area. Consequently there is still considerable consumer confidence in local landline numbers.

Clear Mobitel supports the maintenance of local codeless landline numbers for fixed to fixed calling and would observe that if the Crown Dependencies were separated from the UK NNP both local and mobile numbers would become easily identifiable and consumer confidence would be bolstered. In addition callers from the UK NNP would immediately recognize an out of bundle number.

**Question 4.1: Do you agree with our proposal to modify the Numbering Plan to prohibit direct and indirect revenue sharing with the calling party for calls to all geographic and non-geographic numbers? Please provide reasons for your response.**

Clear Mobitel has no objection to the proposals as they have little impact on the Channel Islands.

**For the avoidance of doubt, this document may be published in its entirety.**

**Clear Mobitel (Jersey) Limited**